

COPY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUN 11 1991

In the Matter of)
)
Amendment of Part 74 of)
the Commission's Rules)
and Regulations with)
Regard to the Low Power)
Television Service)

RM- 7772

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

PETITION FOR RULE MAKING

by the
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June 11, 1991

Counsel for the Community
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Summary

(i) The Community Broadcasters Association ("CBA") is a trade association of low power television ("LPTV") stations and seeks regulatory relief for those LPTV stations that serve their communities through the origination of local programming. Although no change is proposed in the secondary status of LPTV or the awarding of licenses by lottery, those LPTV stations that behave like conventional television stations and provide local programming should be treated as part of a unified television broadcasting industry for purposes other than secondary spectrum use and licensing by lottery.

(ii) The ability of LPTV stations to compete in an active market place is hampered by the word "low" in the name of the service, a call sign format that cannot be registered in computerized systems used for audience measurement and advertising buys, and power levels that often do not permit a station to reach even the segment of an ADI that it is trying to serve.

(iii) To address these problems, those LPTV stations that meet a local programming test and abide by rules applicable to conventional television stations should be permitted to request four- or six-letter call signs, to apply for adequate power provided that no interference is caused to conventional or other LPTV stations, and in general to be treated the same as conventional stations under the Commission's non-engineering rules.

(iv) To police compliance with the requirements to qualify for community status, a station should have to submit a written showing at the time that the status is requested and then demonstrate compliance with community television standards after the fact by filing reports one year after beginning operation under program test authority or after community status is granted and again with each license renewal application thereafter.

(v) The LPTV industry is growing rapidly and is at a crossroads. Its local service orientation is fulfilling the intent of Congress when the service was created. It is important now for the Commission to remove regulatory burdens that are hampering the industry's further development.

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PETITION FOR RULE MAKING

Introduction

1. The Community Broadcasters Association ("CBA") hereby petitions the Commission to amend Part 74 of its Rules and Regulations to make improvements in the regulatory structure governing those low power television (LPTV) stations that provide local service to their communities through the origination of programming. CBA is the national trade association of LPTV licensees and permittees and has frequently participated in Commission and Congressional proceedings to advance the cause of the LPTV industry.

Background and Purpose of Petition

2. There are several aspects of the process of licensing and regulation of the LPTV service that seriously and unnecessarily impair the ability of LPTV stations to compete in the television marketplace and that can be easily changed without infringing on the rights or privileges of

anyone. These include the name by which the stations are called on their licenses, the format of their call signs, limitations on power, and the general application of rules and regulations governing "television stations" to LPTV stations. This petition requests changes in these areas.

3. CBA is not proposing any change in the fundamental structure of the LPTV service -- that LPTV stations are secondary users of the spectrum, that LPTV stations may not cause interference to primary spectrum users or to one another, and that LPTV construction permits are awarded by lottery rather than by comparative hearing.

4. The intent of CBA's proposed changes is to allow LPTV stations that behave like conventional television stations to be treated as part of a unified television broadcasting industry for purposes other than secondary spectrum use and licensing by lottery. Now is the time for these changes to be made, for the LPTV industry is at an important crossroad.

5. There are now over 1,000 LPTV stations authorized in this country, and a substantial number of them are producing significant amounts of local programming. This programming is bringing local service -- which is and has always been the bedrock of American broadcasting -- to audiences who have never before enjoyed such service. These audiences are in communities that normally cannot support their own conventional television service -- including the

general population of small cities and towns and also specialized audience enclaves (including minority and special interest groups)^{1/} in larger markets.^{2/} In other words, the hopes of Congress and the Commission when the LPTV industry was created are being realized in practice.

Problems Faced by LPTV Stations

6. LPTV stations labor under competitive disadvantages in the video marketplace for several reasons. While some disadvantages are related to the secondary nature of the service, many result from regulatory treatment that is unnecessary and can and should be changed. First, the words "low power" and "translator" should be removed from the

^{1/} According to the "Low Power Television 1990 Industry Survey," dated December 14, 1990, by Mark J. Banks, Ph.D., and Michael J. Havice, Ed.D., of Marquette University (the "Marquette Study"), about one-eighth of 102 LPTV stations surveyed are minority owned, with an average of 61% minority ownership -- far greater percentages than in any part of the conventional television or radio industries. The Marquette Study was commissioned by CBA. A summary of the Study is attached hereto as Exhibit 1.

^{2/} The audience of an LPTV station is almost always fundamentally differently structured than the audience of a conventional television station because of the LPTV station's smaller signal coverage area. Conventional television stations serve "Areas of Dominant Influence" ("ADI's") that are established by ratings services and are used as geographic units for audience measurement and the sale of advertising time. An LPTV station will rarely be able to cover an entire ADI, especially in a hyphenated market. For example, an LPTV station might cover Hartford or New Haven, Connecticut, but not all of the Hartford-New Haven market. It might cover Miami or Ft. Lauderdale, Florida, but not the entire Miami-Ft. Lauderdale market. LPTV stations must compete for advertising in this market structure, which is not well suited to LPTV but is a fact of life, like it or not.

licenses of locally programmed stations.^{3/} These words have negative connotations that are particularly severe for stations that originate programming. "Low" power suggests inadequate power, even though the signal coverage area of many LPTV stations reaches a substantial audience. The word "translator" suggests just that --a passive repeater with no local service at all -- and also often has a negative connotation. Program-producing LPTV stations would be helped significantly in improving their public image if the Commission simply gave them a different label. CBA suggests the name "community television stations" to reflect the local service orientation of those stations.

7. Community stations also have problems achieving recognition of their actual audience levels because the public is not accustomed to the combination letter/number call sign used in the LPTV and translator services and consequently does not report LPTV viewing properly to audience measurement services. Moreover, audience measurement services such as Arbitron have four- or six-letter fields for call signs in their computer databases. They cannot accept the five alpha-numeric characters used to identify community broadcasting stations today and the two numerical digits included in LPTV call signs. It is already difficult for a community station that covers less than an entire ADI to make

^{3/} The FCC form on which licenses are issued contains both words and is used for LPTV stations and translators alike, regardless of whether or not they originate programming.

a showing in an ADI-wide ratings report,^{4/} but the problem becomes even worse if the rating service cannot recognize viewing reports submitted by people who are in fact watching the station.^{5/}

Proposed Solutions

8. The Commission should help remedy this problem by making four- and six-letter call signs^{6/} available to qualifying community stations under the same system that is used for conventional TV stations. This relief can be provided without significantly increasing the Commission's administrative burden or exhausting the limited number of available call signs by limiting the use of four- and six-letter call signs to community stations that meet the local programming standard discussed below.

9. Qualifying community stations with an established local programming track record should also be permitted to apply for facilities that will enable them to

4/ The problems of LPTV stations in establishing the size of their audience are discussed in some detail in the Marquette Study.

5/ Attached hereto as Exhibit 2 is a copy of a station/cable report form for Station W43AG, Hopkinsville, Kentucky, from Arbitron. It does not specify "W43AG," but rather attempts to force the call sign into a conventional all-letter television mold as "WAG-TV."

6/ The fifth and six letters, when used, are the suffix "-TV" and are usually used to distinguish a TV station from a radio station that uses the same initial four letters.

properly cover the communities they serve, without regard to the present output power limits of 10 watts for VHF and 1,000 watts for UHF. As previously stated, no change is proposed in the existing interference rules or secondary status of the LPTV and translator services, including community stations; but if a community station can operate on a non-interference basis, and that station provides a high degree of local service, it should be permitted to operate with sufficient facilities to reach the people it serves. At a minimum, each station should be able, subject to interference standards, to apply for facilities that provide principal city grade service to the community it can demonstrate that it serves, however that "community" may be defined for a particular station.^{7/}

10. Finally, those local community stations that behave like full-fledged television stations should be treated as "television" stations for general regulatory purposes. There are many Commission rules, regulations, and

^{7/} Some community broadcasters may ultimately want to convert from secondary to primary status and so may apply for conventional television licenses. When they do, their record of local community broadcasting service should weigh very heavily in their favor in a comparative hearing, in accordance with the expansive interpretation of "past broadcast service" by the Commission in Ronald Sorenson, 6 FCC Rcd. 1952 (1991), 1991, at par. 12-13. The Sorenson interpretation should be even further expanded when a community station operator applies for a conventional TV license; for as the Commission has recognized in the comparative renewal context, there is no better proof of what may be expected of an applicant in the future than its proven broadcast track record in the same community.

policies that apply to "television stations," and there is sometimes uncertainty as to whether or not they apply to LPTV stations. Often there is no reason why they should not apply, but the extension of Part 73 rules to LPTV through incorporation by reference in Section 74.780 does not always follow a logical pattern.^{8/} Yet a television station is a television station as far as the public is concerned; conventional and LPTV stations alike are tuned in the same way on the same receivers, and the public expects the same standard of performance from both. Moreover, community licensees that invest substantial amounts of money in programming should have the same right to protect their investment that conventional television licensees have.^{9/} Therefore, community stations that originate programming should be presumed to be

^{8/} For example, LPTV stations are subject to the requirement of Section 73.3613(a) that they file network affiliation contracts, but the regulations governing network conduct and network-affiliate relations in Section 73.658 are not listed in Section 74.780.

^{9/} Protection of whatever protection a television station is able to negotiate privately is the basic purpose of the syndicated exclusivity rules, which do not by their terms apply to any LPTV stations at this time, although the desirability of extending coverage to LPTV is still pending before the Commission. One community station operator in Oregon has complained to the CBA that although some \$6 million in equity has been invested in his company; his flagship station has been on the air four years, broadcasts 24 hours a day, and is carried on seven cable TV systems serving some 45 communities, and he has spent some \$1.5 million on programming, including local programming, the contractual arrangements he has bargained for so hard are not given the basic regulatory protection that conventional TV station contracts have.

"television" stations for all purposes except when a reasoned decision is articulated to treat them differently.^{10/}

Qualifications for Community Television Status

11. CBA does not propose that every station now licensed as a low power television station or translator be granted the benefits and relief sought in this petition. Rather, only those community stations that are willing to operate under the overall television regulatory scheme should be included. To qualify for the relief requested herein, a station should live by the programming and structural rules applicable to conventional television stations.

12. These rules include some to which LPTV is already subject, including equal time, access for federal candidates and other political broadcast rules; prohibitions on obscenity and indecency; and restrictions on the broadcast of lottery information and deceptive advertising. They should also include the children's television programming requirements adopted on April 9, 1991, in MM Docket No. 90-570, minimum hours of operation, whatever anti-trafficking restrictions are placed on conventional stations,^{11/}

^{10/} Treatment by the Commission of community stations as television stations will also help encourage Congress to treat them that way in the drafting of must carry and other legislation governing cable television systems.

^{11/} Speculation should not be permitted any more for local community station licenses than it is for conventional TV station licenses.

requirements to maintain a main studio and local public inspection file, ownership reporting,^{12/} and engineering rules designed to ensure a high standard of technical service to the public.^{13/}

13. Finally, LPTV stations should have to earn the relief proposed in this petition by providing substantial amounts of locally originated programming, since local programming is the heart of what the Commission should be seeking to encourage and preserve in community television. CBA suggests that a station be required to devote at least 20% of the minimum weekly number of hours of operation required of conventional television stations to local programming.^{14/}

^{12/} Multiple and cross-ownership restrictions should also apply, but tailored to the fact that LPTV stations have less impact on the market than very powerful conventional TV stations. Any such rules should be structured to nurture the growth of the new LPTV industry, just as the Commission nurtured the growth of the FM and UHF-TV industries with relaxed regulation during the early years of their development. For example, cross-ownership with other, more established, media in the same market has proved advantageous to the development of the LPTV industry. Regulation should be the same regardless of whether the LPTV station is UHF or VHF, because contrary to the conventional TV situation, VHF LPTV stations generally have lesser coverage than UHF stations. The total number of stations that could be owned might also be different for community stations than for conventional stations.

^{13/} These include transmitter monitoring and operator requirements and proofs of performance when needed.

^{14/} The minimum service requirement for conventional stations increases during the first few years of operation to a maximum of 28 hours a week. The 20% test should apply against 28 hours rather than actual broadcast time, because the Marquette Study reports that 75% of LPTV stations are on the air 24 hours a day. The Commission should not adopt any
(continued...)

Enforcement

14. The special "community" status proposed by CBA would not automatically be given to all LPTV stations, and qualifications for that status would be based on programming, which the Commission does not normally supervise in detail. Therefore, a mechanism must be established for those LPTV operators who desire community status to seek and be granted that status by the Commission without excessively intrusive regulation or burdensome paperwork for either the industry or the Commission.

15. CBA suggests that no change be made in the application process for construction permits for new stations, so as not to slow that process down. LPTV stations desiring community status should be able to request it at any time after receipt of a construction permit. The request should include the desired call sign and a proposed schedule of operating hours, together with a schedule of planned local programming, including the name, length, day of week, time of day, and a description of the content of each local program or series. It should also include the address of the proposed main studio within the station's principal city

14/ (...continued)

rule that would encourage stations to reduce their overall hours by penalizing them for staying on all night by increasing local programming requirements based on overnight operation.

coverage contour^{15/} and a statement that a local public inspection file is available in the community of license and, if the studio is not within the community of license, that toll-free telephone access is available to residents of that community.^{16/}

16. One year after beginning operation under initial program test authority or after community status is granted (whichever is later), each community station should be required to submit a statement of the date, length, time of day, and the general nature of each local program broadcast during the first year of operation.^{17/} A similar showing

^{15/} It might be necessary to require stations to provide maps of their principal city grade contour, as this information is not normally required in LPTV applications.

^{16/} These are all requirements that apply to conventional television stations. See Sections 73.1125 and 73.3526/3527 of the Commission's Rules.

^{17/} Community status would be based on the fact that programming is locally produced and not the content of the program, so the establishment of this regulatory classification would not raise any Constitutional issues related to content regulation. The concept of recognizing "local" programming has a long and time-honored history. For several decades prior to the deregulation of the 1980's, broadcasters were required to keep program logs that included classifying programs as "local," "recorded," "network," or "other"; and during most of that time, some local programming was considered necessary to justify license renewal. "Local" was defined as "any program originated or produced by the station or for the production of which the station is primarily responsible, employing live talent more than 50% of the time. Such a program, taped filmed or recorded for later broadcast, shall be classified as local. A local program fed to the network shall be classified by the originating station as local." 47 CFR Sec. 73.1810(h)(1)(i) (1980 ed.). The description of the general nature of each program to be filed with the Commission need be no more detailed than what is

(continued...)

should be required with the station's license renewal application every five years, although it would be appropriate to reduce the paperwork burden by accepting a sampling rather than a complete listing at five-year intervals. If a satisfactory submission is not made at any required time, community status should be withdrawn.^{18/}

Conclusion

17. According to the Marquette study, the average LPTV station has been on the air four years, and some 36% of LPTV stations are already profitable.^{19/} The industry is now much more than the mountain of applications in boxes piled high at the Commission that characterized LPTV a decade ago. It is operational, and it is providing important public

^{17/}(...continued)
included in the quarterly issues-programs list that conventional TV stations must place in their public inspection files pursuant to Section 73.3526(a)(8) of the Commission's Rules. The purpose of the description would be only to enable the Commission to verify that the program or program series was local, not to pass judgment on the program's content.

^{18/} The grant of community status may be conditioned so that withdrawal of that status is not considered a modification of license giving rise to a hearing under Section 316 of the Communications Act. However, the Commission should not act precipitously or arbitrarily, and a station should have the right to be heard at least in writing prior to loss of community status. LPTV stations should be able to obtain community status at any time and to elect to relinquish and/or recoup that status thereafter, similarly to the way that stations may change between LPTV and translator status, but with a compliance showing required any time that either new or resumed community status is requested.

^{19/} Communications Daily reported on the Marquette study on March 7, 1991.

service. Thus now is the time to remove regulatory burdens against which licensees are struggling, and by which they are being frustrated, without good reason. Therefore, CBA requests that the Commission issue a Notice of Proposed Rule Making in response to this petition and grant relief at an early date.

Respectfully submitted,


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June 11, 1991

Counsel for the Community
Broadcasters Association

LOW POWER TELEVISION 1990 INDUSTRY SURVEY

FINAL REPORT
DECEMBER 14, 1990

Mark J. Banks, Ph.D.
Michael J. Havice, Ed.D.

Sponsored By a Grant From
THE COMMUNITY BROADCASTERS ASSOCIATION

INDUSTRY PROFILE

This is a report from the third annual survey of the LPTV industry. Telephone interviews were conducted with 102 station managers and owners. The findings reflect the continued growth and some of the increasing concerns of owners and managers. Among the highlights, this study examined the practices and problems associated with advertising in this medium, and the associated need for reliable audience information. There is also information about the startup costs and economic viability of stations.

Station Facilities. Each year, the industry matures a bit more, establishing a track record that lends stability to the medium, although the interviewers also found evidence of a substantial amount of station trading, voluntary and involuntary shutdowns, and startup delays. But among those stations interviewed, they were on the air an average of nearly four years. Ten-watt stations comprised 24% of the sample, 100-watt stations 35%, and 1,000-watt stations 42%. The survey was designed to eliminate full-time translators, but included part-time translators. Eighteen percent of those surveyed carry simultaneous broadcasts of another station an average 56% of the time.

More than half of the stations were commercial (56%), followed by public/educational (22%), religious (16%), subscription (4%), and combinations of public/commercial (2%). Among all the stations, they averaged 4.1 full-time employees and 3.5 part-time employees. There was a wide range of staff sizes, and several of the stations indicated they also rely on volunteers to operate the station. This was especially true for the religious and public/educational stations.

One-eighth of the stations were minority-owned, representing Hispanic (33%), women (25%), Native American/Eskimo (25%), Asian/Oriental (8%) and other unnamed minorities (9%). Among the minority-owned stations responding, minorities owned an average of 61% of each station.

About half of the stations have ownership in other media. These multiple-media holders owned other LPTV stations (37%), radio (35%), print (20%), full-power television (17%), cable systems (13%), and multi-channel microwave distribution systems (MMDS) and Instructional Fixed Television Services (ITFS) (4%). The percentages add up to more than 100% because some multi-media owners had holdings in more than one of the above media.

Station Markets. There were an average of almost 77,000 households in LPTV's grade A market areas. Almost three-fourths of the stations are carried by cable systems, with a median 19,500 cable households per station. Those carried by cable are carried by an average 2.2 cable systems in market areas that average 3.1 cable systems. Most (86%) stations carried on cable pay nothing to the cable systems for carriage. Among the 14% who do, they pay an average of \$6739 per month to the cable systems. For the stations not on cable, carriage was denied by the cable system in 57% of the cases.

LPTV remains a strong rural medium, with 46% of the stations identifying their markets as rural, followed by 22% urban, 17% suburban, and the remainder combinations of the above. More than a third (34%) of the stations said they serve special demographic populations, averaging an estimated 60,324 people in the specialized audience. The most prominent categories were audiences attracted to religious programming (29%), and audiences composed of specific age or demographic groups (24%). Almost one-fifth of the respondents who said they serve a special audience demographic did not name that specialized audience. The remainder identified children, tourists, Appalachia, students, or combinations of audience groups. These figures demonstrate a cultural and specialized diversity for LPTV, and this diversity is also reflected in the descriptions of the programming of these stations, provided below.

Programming. LPTV continues to be a service somewhat torn between the need for strong local identity through local programming and the need for the economic efficiency (and for many, viability) that nationally-available programming provides. Eighty-nine percent of the stations surveyed use satellite-delivered programming an average of 68% of their program schedule, or over 16 hours of a 24-hour broadcast day.

Eighty-six percent of the stations produce local programming an average 16% of the time, or almost 4 hours of a 24-hour daily schedule. Station broadcast of local production is broken down as follows:

Hours of Local Programming Per 24-Hour Broadcast Day	Percent of Stations
0 hours	14%
1-2	38
3-4	18
5-6	13
7-8	7
9 or more	10

Total 100%	

Fifty-four percent of the stations use syndicated programming an average 19% of the time, or almost 5 hours of a 24-hour broadcast day.

The stations identified more than 25 satellite services they use. Almost a third of them use more than one service. The most popular services are Channel America (21%), Trinity Broadcasting (13%), ACTS (8%), The Family Network (8%), The Home Shopping Network (6%), The Learning Channel (6%), and Univision (5%). All others received less than 5% of the responses.

Well over 30 sources for syndicated programming were mentioned, and most users selected several syndicated offerings. Among the most popular sources were Channel America, Warner, Viacom, Buena Vista, Prime Network, and Raysom. All others were selected by less than three percent of the respondents. Syndicated programs were purchased mostly through barter (55%), followed by cash (28%) and combinations of both. The average amount paid for syndicated programming by those stations using it was \$848 per month.

The most popular types of local programming produced by the stations were Public Affairs (69%), Sports (57%), News (40%), Magazine shows (40%), Children's programs (27%), Religious Programs (11%), and Entertainment programs (11%). Others include educational, women's programs, and promotions and information. Among the local programs, about 16% are broadcast live, and about 58% are produced in the station's own studio.

Most stations (75%) broadcast 24 hours a day, or 168 hours a week. On average, the stations surveyed broadcast 150 hours a week, and only 10% of the stations reported broadcasting less than 100 hours a week. For all programming, stations reported an average cost of \$758 per month. However, among those who answered this question, 51% said they paid nothing for programming, relying on free programs or programs provided entirely through barter.

Station Audiences. As mentioned above, many stations indicate serving specialized audiences, and the diversity of programming sources reinforces that finding.

Unfortunately, LPTV continues to be a medium beset with scarce information about its actual audiences. The major rating services are seldom used, perhaps because station audience numbers seldom rise above the minimum thresholds for reporting by those services, but also perhaps because LPTV markets are often not defined in the same way that the rating services define their market areas. About 15% of the respondents have used Arbitron and 14% Nielsen. A larger proportion (28%) rely on audience-initiated calls and letters, and about 26% do their own in-house surveys. About 6% have commissioned surveys and about the same number rely on their national programming sources to provide audience information. Other means of obtaining audience information are less formal and include descriptions of potential audiences on the basis of census data, word of mouth audience reactions, other local media reporting, and meetings. A small number of stations use on-air promotions to solicit audience participation and reactions.

About 20% of the stations have sponsored specific market studies, at an average costs of \$2612. Many of them relied on volunteers or students to assist with these studies, keeping costs very low.

Advertising. Partly because of the often haphazard and unspecific collection of information about audiences, the sale of advertising is often difficult for the commercial LPTV stations, who must sell time without the advantage of the traditional mechanisms for negotiating prices. This seems to be less a problem for rural stations, whose markets are more readily identifiable, and whose audiences and local advertisers are therefore more easily isolated from larger market media. Though few stations engage in regular audience measures, 44% of them do have media kits.

Almost two-thirds of advertising revenues for LPTV are from local sources. The largest share (50%) of revenues come from door-to-door sales visits, followed by telephone solicitation (17%), underwriting (12%), purchases by local ad agencies (9%), and national ad agencies (5%).

The average cost for a 30-second spot is \$52; and for a 60-second spot, \$80. These costs, however, vary considerably among the stations. Almost three-fourths of the commercial stations have negotiable rates for their spots.

Fifty-seven percent of the stations surveyed said their revenues have increased in the last year. Only 8% indicated a decrease in revenues. The increased revenues are attributed to increased sales in advertising time (61%) the raising of ad time prices (7%), or both (20%). A few stations reported that improvement in programming resulted in increased revenues. About half of the stations reported what their station revenues are, with a median \$650,000 for the past year. The figures are not very reliable, however, and the average yearly revenues among those reporting is a low \$140,678. Thirty-six percent of the stations reported an operating profit in the last quarter.

Station Finances. More than three-fourths (79%) of the stations are privately owned, followed by 11% public/educational stations, 6% owned through publicly held stock, and 3% community owned. The primary means of financing for the stations has been personal investment by the owners (40%), followed by 18% bank loans, 14% educational institutions, 9% private loans, 9% donations, 7% corporate investments, and 2% community purchase.

Because of the high incidence of personal investment by owners, most stations said they did not have any difficulty obtaining financing. Of the 18% who said they did, the biggest reason was that potential investors or lenders regarded LPTV as a bad risk. About a third said the relatively unknown status of the medium was an impediment. Other minor reasons were "insufficient collateral" and difficulty in getting donations. The average reported total cost to start up a station was \$192,940, which seems low and may not reflect some hidden or forgotten costs.

SUMMARY

On the whole, the LPTV industry seems to continue to be economically healthy, although the reader is cautioned that those stations that have failed were not included in this survey. In programming, some satellite services seem to be emerging as prominent services for the medium. Stations who use syndicated sources, however, tend to rely more on the established providers of syndicated fare for television. Local programming is done by a majority of stations, but represents a small portion of the programming schedule for most of them. LPTV retains a strong component of specialized programming for special-interest audiences.

But LPTV continues to be inhibited by inadequate ongoing information about its audiences, and this impediment is a roadblock for many stations in their negotiations for advertising revenues.

LPTV is largely a privately-held industry many of whose owners reached into their own pockets to finance their venture. Surprisingly, there is a small proportion of community and public/educational ownership, and the medium remains largely a commercial medium, albeit with a strong religious contingent. Though one of the FCC's primary purposes was to stimulate minority ownership, the percentage of minority ownership remains small, though not insubstantial, and among those minority owners, their percentage of ownership for their respective stations is strong.

THE ARBITRON COMPANY
STATION/CABLE REPORT

EXHIBIT 2

RUN DATE: 05/30/91

STATION: WAG -TV (CH. 43)

SYSTEMS WITHIN STATION: 1

DATE OF LAST COMPLETE UPDATE: 03/18/91

SYSTEM ID #: 180071
SYSTEM NAME: CENCOM CABLEVISION
OWNER NAME: CENCOM CABLE INCOME PARTNERS
ADDRESS: PO BOX 569-614 N MAIN ST
HOPKINSVILLE, KY 42240

CABLE SYSTEM CONTACT: TOM WOOD

CHANGE (IF ANY)

PHONE: 502/886-4004

ALTERNATE CABLE SYSTEM NAMES:
COMMUNICATION PROPERTIES
HOPKINSVILLE TV CABLE CO
PENNROYAL/HOPKINSVILLE CATV
TIMES MIRROR CATV-HOPKINS
TOWER COMMUNICATIONS INC

LINEUP 01: WAG 'S CABLE CHANNEL: 003

CHANGE (IF ANY)

COMMUNITIES SERVED	COUNTY	STATE
HOPKINSVILLE	CHRISTIAN	KY

COMMENTS:
